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August 19, 2019

**VIA ELECTRONIC FILING**

Jocelyn G. Boyd, Esquire  
Chief Clerk & Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

Joseph Melchers, Esquire  
General Counsel  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

Re: **Docket Nos. 2019-169-E; 2019-170-E; 2019-182-E; 2019-185-E; 2019-186-E;  
2019-195-E; 2019-196-E; 2019-207-E; 2019-208-E; 2019-210-E; 2019-211-E;  
2019-224-E; 2019-225-E**

**2018-202-E Petition of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC  
for Approval of CPRE Queue Number Proposal, Limited Waiver of Generator  
Interconnection Procedures, and Request for Expedited Review**

Dear Ms. Boyd and Mr. Melchers:

Following the conclusion of the allowable ex parte briefing held by the Public Service Commission (the "Commission") on Wednesday August 14, 2019, a question arose as to compliance with Commission Order 2018-803.

More specifically, statements were made by George Brown during the allowable ex parte briefing as to winners selected from the RFP process associated with the Duke Energy Carolinas, LLC ("DEC") and Duke Energy Progress, LLC ("DEP") Competitive Procurement of Renewable Energy ("CPRE") Program. A question was raised as to whether those winners were from Tranche 1 or Tranche 2 of the CPRE Program. Mr. Melchers, Esquire inquired of Heather Shirley Smith, Esquire, counsel for Duke Energy Carolinas, LLC and Duke Energy Progress, LLC, (the "Companies") and myself on behalf of the Office of Regulatory Staff as to whether Tranche 2 was already underway. In Order 2018-803 issued December 12, 2018, the Commission limited its grant of waivers to the South Carolina Generator Interconnection Procedures to projects awarded in

Tranche 1 of the CPRE Program and required certain actions prior to any grant of any future SCGIP waivers or cost recovery discussions. Order 2018-803, p. 14. Indeed, Order 2018-803 at page 15 provides "...Tranche 2 will not be approved without a proceeding before the Commission that defines the program and results in a framework for administering CPRE in South Carolina." Commission staff became concerned based on information conveyed during the briefing that the Companies proceeded with Tranche 2 activities without initiating a proceeding before the Commission to address the issues raised in Order 2018-803.

The Companies and ORS were asked to review and report back to the Commission.

ORS can find no evidence that Tranche 2 has opened for bids as of Friday, August 16, 2019. A stakeholder meeting was held on August 7, 2019 to discuss Tranche 2 and the stakeholder report was issued on August 14, 2019. The stakeholder report indicates the bid process will begin in October 2019.

Counsel for DEC and DEP reported on Thursday, August 15, 2019, that the information referenced during the allowable ex parte briefing concerned the winning bids selected for Tranche 1 of the CPRE Program, not Tranche 2.

To ensure compliance with the provisions of Section 58-3-260, this letter is being submitted for inclusion in the dockets noticed for the allowable ex parte briefing as well as the CPRE docket.

Yours Truly,



Nanette Edwards

cc: All Parties of Record (via E-mail upon agreement)  
All Parties of Record (without agreement via U.S. Mail)